

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

THE STATE OF MISSOURI, *et al.*,

Plaintiffs,

v.

Civil Action No. 3:22-cv-1213

PRESIDENT JOSEPH R. BIDEN, JR., IN
HIS OFFICIAL CAPACITY AS PRESIDENT
OF THE UNITED STATES OF AMERICA,
et. al.,

Defendants.

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiffs respectfully request a 7-day extension to respond to Defendants' supplemental brief in response to the Court's order of August 27, 2024, making their response due October 29, 2024. All parties have agreed to this extension. In support of this motion, Plaintiffs state as follows:

1. Defendants filed their 37-page response brief on October 8, 2024.
2. According to the Court's briefing schedule, Plaintiffs' reply is due October 22, 2024.
3. The attorney for individual Plaintiffs Jayanta Bhattacharya, Jill Hines, Aaron Kheriaty, and Martin Kulldorff is the primary drafter of the reply brief.
4. She and her family fell ill with Covid-19 last week, impeding her ability to work on the reply brief during that time.

5. In order to adequately address Defendants' lengthy arguments, which by consent is an oversized brief, and to accommodate the schedules of all co-counsel to review the brief, Plaintiffs request a 7-day extension of time.

6. Accordingly, Plaintiffs respectfully request that the Court grant this motion.

Dated: October 15, 2024

Respectfully submitted,

/s/ Jenin Younes

JENIN YOUNES *

Litigation Counsel

JOHN J. VECCHIONE *

Senior Litigation Counsel

ZHONETTE BROWN*

Senior Litigation Counsel

New Civil Liberties Alliance

4250 N. Fairfax Drive, Suite 300

Arlington, VA 22203

Main: (202) 869-5210

Direct: (202) 918-6905

E-mail: jenin.younes@ncla.legal

Counsel for Plaintiffs Dr. Jayanta Bhattacharya,

Dr. Martin Kullendorff, Dr. Aaron Kheriaty, and Jill Hines

ELIZABETH B. MURRILL

Louisiana Attorney General

ANDREW BAILEY

Missouri Attorney General

/s/ Zachary Faircloth

ZACHARY FAIRCLOTH

Principal Deputy Solicitor General

TRACY SHORT

Ass't Attorney General

D. JOHN SAUER

Sp. Ass't Attorney General

1885 N. Third St.

Baton Rouge, LA 70802

(225) 326-6766

MurrillE@ag.louisiana.gov

Counsel for Louisiana

/s/ Josh M. Divine

JOSH M. DIVINE

Solicitor General

TODD A. SCOTT

Senior Counsel

207 W. High St.

P.O. Box 899

Jefferson City, MO 65102

(573) 751-8870

Joshua.Divine@ago.mo.gov

Counsel for Missouri

/s/ John C. Burns

JOHN C. BURNS *

Burns Law Firm

P.O. Box 191250
St. Louis, Missouri 63119
P: 314-329-5040
F: 314-282-8136
E-mail: john@burns-law-firm.com
Counsel for Plaintiff Jim Hoft
**Admitted pro hac vice*